

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**AGREED MOTION FOR ENTRY OF AGREED PROTECTIVE ORDER**

Defendant, Clark Consulting, Inc. (“Clark”), by and through its attorneys, herein moves for entry of a proposed Agreed Protective Order. In support of this Motion, Defendant states as follows:

1. This case involves proprietary Trade Secret information which the parties seek to preserve and protect.
2. The parties have agreed to a proposed Agreed Protective Order a copy of which will be electronically tendered to the Court at [proposed\\_order\\_shadur@ilnd.uscourts.gov](mailto:proposed_order_shadur@ilnd.uscourts.gov), pursuant to this Court's Standing Order governing the submission of proposed orders.
3. The Parties request that the Court enter the proposed Agreed Protective Order to help insure the integrity and confidentiality of the documents that have been produced.
4. The proposed Agreed Protective Order complies with this Court's Standing Order governing the use of protective orders and the filing of documents under seal.
5. Lead counsel for Plaintiff, Chad Moeller, and lead counsel for Defendant, Alan Marcuis and Thomas S. Bradley, have conferred concerning the proposed protective order, and both counsel request that said order be entered.

Dated: January 25, 2008

s:/ Thomas S. Bradley

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**ATTORNEYS FOR PLAINTIFF CLARK  
CONSULTING, INC.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing **Agreed Motion for Entry of Agreed Protective Order** in the above-captioned matter to be filed electronically with the Clerk of the District Court, and hand-delivered a copy of the foregoing to the Chambers of the Honorable Milton Shadur, and served a copy of the foregoing by operation of the Court's CM/ECF system has been served via operation of this Court's electronic filing system on this 25<sup>th</sup> day of January, 2008 upon:

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